

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

| | | |
|---------------------------|---|---------------------------------------|
| UNITED STATES OF AMERICA, |) | CASE NO.: 1:22-CR-085 |
| |) | |
| Plaintiff, |) | JUDGE DAN AARON POLSTER |
| |) | |
| v. |) | |
| |) | |
| CHRISTOPHER FICKLIN, |) | <u>JOINT MOTION TO CONTINUE DATES</u> |
| |) | <u>AND DEADLINES</u> |
| Defendant. |) | |

Now comes the United States of America, by and through counsel, Michelle M. Baeppler, First Assistant United States Attorney, and Margaret A. Sweeney, Assistant United States Attorney, and the Defendant Christopher Ficklin, by and through counsel Steven L. Bradley, and hereby move this Honorable Court to continue the dates and deadlines in this matter.

On August 16, 2022, this Court held a pretrial conference and set a Change of Plea Hearing in this case for September 29, 2022. This Court also ordered the United States to respond to Defendant's pending Motion to Dismiss on or before October 7, 2022.

Since that time, defense counsel and counsel for the government have met in person and spoke several times over the phone in an effort to resolve this matter. The parties have discussed details of a possible agreement; however, the parties need additional time to finalize an agreement and allow defense counsel the time to review the agreement with the Defendant. Therefore, the parties are jointly requesting that this Court continue the Change of Plea hearing until October 27, 2022. Additionally, the United States requests, and the Defendant does not object, that the Court continue the motion response deadline to November 3, 2022.

The parties submit that the ends of justice are served by granting this motion and that this Motion is not made for any improper purpose. Therefore, the parties respectfully request that this Court grant the parties' request.

Respectfully submitted,

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